

IDG 131003
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UNITED STATES DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE
Dworshak Fisheries Complex
276 Dworshak Complex Drive
Orofino, ID 83544



April 24, 2013

Chris Gebhardt
U.S. Environmental Protection Agency, Region 10
NPDES Compliance Unit, OCE-133
1200 Sixth Avenue, Suite 900
Seattle, WA 98101

NPDES Permit No. IDG131003

Re: Discharge of Media to the Clearwater River from Offline Settling Basin

On April 18, 2013, Rhenn Casto of Peck, Idaho, contacted the Idaho Public Health Department, North Central District, to report the accumulation of a black plastic material along the banks of the Clearwater River. Following an interview with Mr. Casto, the complaint was forwarded to the Nez Perce Tribe given the location of this incident within the boundary of the Nez Perce Indian Reservation. Tribal staff identified the material as possibly originating from Dworshak National Fish Hatchery (NFH) and contacted hatchery staff on April 22, 2013 to report the incident and seek corrective action.

Upon notification hatchery personnel visited the Harper's Bend Recreation Area; a site along the Clearwater River identified in Mr. Casto's complaint, and recovered a small quantity of plastic material. Staff confirmed that the material originated from the Dworshak NFH System II biofilter and served to promote optimal water quality in a water reuse situation. A majority of this material was recovered from the high water litter line. U.S. Army Corps of Engineers staff at the Dworshak Project confirmed that the Clearwater River reached a recent peak water level on April 7. As a result, hatchery personnel believe the deposition of the black plastic biofilter media resulted from a previous release from the hatchery and likely one that occurred slowly over time. The recent high water event may have contributed to the downstream movement of this previously deposited material.

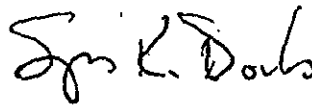
The System II biofilter is no longer used as part of the Dworshak NFH reuse system and is now operated as a flow through settling basin to promote the collection of solids generated from fish production operations. Unfortunately the aging Dworshak NFH infrastructure failed to contain this material and unintentional discharges of the black plastic biofilter media have occurred in the past. Hatchery staff reported a similar incident to the U.S. Environmental Protection Agency and the Idaho Department of Environmental Quality during September 2011. At that time hatchery personnel installed a metal baffle prior to the offline settling basin discharge screen to prevent the discharge of this plastic material to the Clearwater River and initiated the removal of the media from the biofilter. The U.S. Fish & Wildlife Service issued a contract to the vendors King's Thrones and Roto Rooter to remove the obsolete media from the System II biofilter in October 2012. As a result, a total of 256 tons of unrecyclable material were removed from the

biofilter and disposed of in an approved landfill. Unfortunately a residual amount of this plastic material remains in isolated areas (e.g. sump collection areas, galley piping, and decommissioned biofilter piping) and subject to discharge to various areas on the hatchery during pollution abatement cleaning activities. Attempts to avoid discharging the media have obviously failed. As a result, hatchery personnel have initiated the following corrective actions to avoid further discharges of plastic media to the Clearwater River in the future:

1. Hatchery personnel will allow the System II biofilter to refill with water and then remove the media from the surface. This effort will be repeated several times to flush as much media out of the piping as possible. The floating media can then be manually removed by hatchery personnel.
2. An approved vendor capable of safely entering confined spaces will be used to collect residual media from areas within the biofilter infrastructure that pose a threat to employee health and safety.
3. A secondary containment boom will be installed within the offline settling basin to reinforce the existing metal baffle and discharge screen.
4. A standard operating plan will be prepared that thoroughly describes the operation of the System II biofilter and offline settling basin infrastructure with emphasis on avoiding future discharges of plastic media to the Clearwater River.
5. Partners (Idaho Department of Fish & Game, Nez Perce Tribe, and U.S. Army Corps of Engineers) have been notified and asked to report accumulations of plastic media along the Clearwater River to hatchery personnel to facilitate clean-up efforts.

The U.S. Fish and Wildlife Service, Nez Perce Tribe, and U.S. Army Corps of Engineers continue to coordinate efforts leading to the eventual rehabilitation of Dworshak NFH to assure full compliance with the Clean Water Act as specified within the 2011 Federal Facilities Compliance Agreement. Until that time the interim measures identified above will help prevent future discharges of plastic biofilter media to the Clearwater River. Please feel free to call me at (509) 427-2227 if you have questions or require additional information.

Sincerely,



Speros K. Doulos
Acting Complex Manager
Dworshak Fisheries Complex

cc: J. Cardwell, IDEQ
S. Jurries, PHD2
E. Marugg, PHD2
B. Johnson, NPT
R. Johnson, FWS
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Gebhardt, Chris

From: Doulos, Speros [speros_doulos@fws.gov]
Sent: Wednesday, April 24, 2013 11:41 AM
To: Gebhardt, Chris; John.Cardwell@deq.idaho.gov
Cc: sjurries@phd2.idaho.gov; emarugg@phd2.idaho.gov; jerrodr@nezperce.org; Damian Walter; Arthur.F.Leskowich@usace.army.mil; Becky Johnson; Rich; Jill Olson; Mark Drobish; Greg Parker; Adam Izbicki; Nathan Wiese; Steve Yundt; Kent Hills
Subject: Dworshak NFH Discharge of Plastic Media to the Clearwater River from Offline Settling Basin
Attachments: USEPA Notification - Discharge of Biofilter Media at Dworshak NFH.pdf

Please feel free to call if you have questions or need additional information.

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